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**Via ECF**

April 21, 2025

The Honorable Jennifer E. Willis, U.S.M.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Charles v. Pinnacle Too, LLC., et al.*  
Case No.: 22-cv-4232 (DEH)(JW)

Dear Judge Willis:

This office represents Plaintiff in the above-referenced matter. On April 18, 2025, the stay imposed by the Court lifted automatically (Dkt. No179). That same day, Plaintiff informed the Court that on April 21, 2025, Plaintiff would initiate distribution of the class notice (Dkt. No. 182).

By the Court's Order certifying the class action, Plaintiff was permitted to distribute the notice by mail (Dkt. No. 155). Plaintiff received Defendants' class list several weeks after the Court's Order certifying the class action. Defendants' class list includes several thousand individuals. As such, Plaintiff requests leave to distribute the notice by email and text, which information is already included on the class list produced by Defendants. Distributing the notice by email and text will have a better delivery rate and minimize incurring excessive costs in this litigation.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ C.K. Lee  
C.K. Lee, Esq.

cc: all parties via ECF